

JEREMY M. FEIGENBAUM
ACTING ATTORNEY GENERAL
R.J. Hughes Justice Complex
25 Market Street,
P.O. Box 112
Trenton, New Jersey 08625-0112
Attorney for Defendants Sarah Davis and Marcus Hicks.

By: Niccole L. Sandora
Deputy Attorney General
Attorney ID# 240632017
(609) 376-2440
Niccole.Sandora@law.njoag.gov

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE

BRIEAUNA GIBSON,	:	HON. MICHAEL A. SHIPP, U.S.D.J.
PLAINTIFF,	:	HON. TONIANNE J. BONGIOVANNI, U.S.M.J.
v.	:	
ANTHONY VALVANO; AMIR BETHEA;	:	
KELLY BURLIAN; DIANNA TORRES;	:	NOTICE OF MOTION TO DISMISS
JOSEPH RIOTTO; FRANCIS	:	PLAINTIFF'S THIRD AMENDED COMPLAINT AS
CASCARELLI; SCO F/N/U GREEN	:	TO DEFENDANTS DAVIS AND HICKS
AKA BASKERVILLE; KEVIN PEREZ;	:	
SEAN ST. PAUL; SARAH DAVIS;	:	
ROBIN KELLER; AND JOHN DOES 1	:	
TO 10, ALL INDIVIDUALLY AND	:	
IN THEIR OFFICIAL CAPACITIES	:	
AS NEW JERSEY DEPARTMENT OF	:	
CORRECTIONS OFFICERS AND/OR	:	
EMPLOYEES; MARCUS HICKS,	:	
COMMISSIONER OF THE STATE OF	:	
NEW JERSEY DEPARTMENT OF	:	
CORRECTIONS, IN HIS OFFICIAL	:	
CAPACITY, ONLY,	:	
DEFENDANTS.	:	
	:	

PLEASE TAKE NOTICE that on June 6, 2022, the undersigned
Jeremy M. Feigenbaum, Acting Attorney General, by Niccole L.

Sandora, Deputy Attorney General, appearing for Defendants Sarah Davis and Marcus Hicks, shall move for the entry of an Order dismissing Plaintiff's Third Amended Complaint as to the moving defendants.

PLEASE TAKE FURTHER NOTICE that the undersigned will rely upon the attached brief, certification of counsel, and exhibits in support of this motion.

Oral argument is requested if this motion is opposed.

A proposed form of Order is submitted herewith.

JEREMY M. FEIGENBAUM
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: */s/ Niccole L. Sandora*
Niccole L. Sandora
Deputy Attorney General

DATED: May 11, 2022